

Rhode Island Department of Elementary and Secondary Education

IDENTITY CRISIS

2/5/2009

Implementing the New Federal Guidance on Maintaining,
Collecting, and Reporting Racial and Ethnic Data

About the implementation packet



- Commissioner's letter to superintendents
- USED Policy Guidance
- State Implementation Guidance
- Mailed to superintendents on 1/23/2009
- Access related information on RIDE's Website:
<http://www.ride.ri.gov/>, click on Data
- or simply follow this link -
<http://www.ride.ri.gov/RIDE/RaceAndEthnicityDataCollection.aspx>

Key New Requirements



States will be required to **report** aggregated data to ED using these new standards by the fall of 2010 for the 2010–11 school year. These are the seven categories for reporting:

- ☐ American Indian or Alaska Native
- ☐ Asian
- ☐ Black or African American
- ☐ Native Hawaiian or Other Pacific Islander
- ☐ White
- ☐ Two or more races
- ☐ Hispanic of any race

Two Question Format



Please answer **both** questions.

1. Are you Hispanic or Latino? (choose only one)

☐ Yes

☐ No

2. What is your race? (choose one or more)

☐ American Indian or Alaska Native

☐ Asian

☐ Black or African American

☐ Native Hawaiian or Other Pacific Islander

☐ White





The two-part question

- ☐ Ethnicity First, Race Second
- ☐ Key – two-part questions is being asked consistently across State, district and schools
- ☐ “Race Unknown” or “Other” not an option
- ☐ Hispanics should enter a race
 - ☐ Is this mandatory?
- ☐ Ordering of Race categories



State Implementation



- Synchronized transition to new standards across all systems, including the student ID system (SASID), the state testing and accountability systems, program-based Census, and all local
- All source systems will use the Two Question Format to collect data.
- State collects responses using the Two Question Format and reports by seven categories to ED



Why do it?



- ☐ duh, it's required
- ☐ Civil rights enforcement
- ☐ Other Federal agencies already doing it
- ☐ Consistent with other data, facilitating state and local policy analysis
- ☐ Reflects the population
- ☐ Allows individuals to more accurately identify themselves





Implementation Sequence

- Fall 2008 – initial assessment of local systems, understanding state and federal reporting requirements, timelines
- Winter 2008-Spring 2009 – local and state systems adjustments, local collection of additional information
- Summer 2009 – initial optional reporting of additional information
- Fall 2009 – first required reporting of race/ethnicity data in new categories by districts, in addition to current race/ethnicity
- 2009-10 – data quality and validation checks, resolve problems
- 2010-11 – first year reporting only by new race/ethnicity categories to ED



Self vs. Observer Identification



- Whenever possible, students should be allowed to self-identify their race and ethnicity.
- At the elementary and secondary levels, students' parents or guardians are typically the more appropriate source of race/ ethnicity information.
- What if there is a conflict between the choices of a student and his/her parent?
- If self-identification is not practicable or feasible or the respondent has been provided adequate opportunity to self-identify, but still leaves the item blank or refuses to self-identify, observer identification should be used.





Observer Identification

- Check student's prior record
- Check whether a student's sibling's record
- First hand knowledge from teacher or counselor
- Student's and parent's country of birth or origin
- Student's home language or parent's language of preference
- Knowledge about the community to which the school belongs
- Visual



Re-Identification

- Though not mandated by the USED, ED strongly encourages that current students be allowed to re-identify their race and ethnicity to ensure comparability of data and to accurately reflect diversity.
- Re-inventorying only some students could create a perception among students that schools are singling out one racial group.
- Opportunity to allow individuals to self-identify with multiple races.





Record Maintenance

- Because the collection of the data is associated with the disbursement of Federal funds, the regulatory requirement for maintaining original individual responses is a minimum of three years unless there is an audit, inspection, review, or investigation that has not been resolved (in that case, the responses must be maintained until resolution is complete).
- Institutions must maintain the information in the responses as it was collected using the two-part question, in case the Department needs it in the exercise of its oversight and enforcement responsibilities.
- In addition, other statutes or regulations, such as the Common Rule for the Protection of Human Subject in Research (34 CFR 97), may require that individual responses be retained for a longer period for some data collections.





Implementation for Districts

- Understand guidelines that will be conveyed to schools.
- Identify specific changes to be made in districts' data systems to accommodate new requirements.
- Update all forms to reflect changes.
- List personnel/departments assigned for making such changes, both in-house personnel and vendors; and identify contact person(s) for each area.
- Understand the self-identification process: rationale, requirements, methodology
- Understand the difference between self versus observer identification, and the observation process
- Understand record retention requirements.



Training and Communication

- ☐ What is the implementation timeline?
- ☐ Is it legal?
- ☐ How is it used?
- ☐ Why the change?
- ☐ What will change and when?
- ☐ What if someone refuses?

System Requirements for Districts



- ❑ Understand the two-part question format and new race categories.
- ❑ Understand the federal aggregate reporting requirements.
- ❑ Identify specific changes to be made in vendor systems or products and provide minimum data standards.
- ❑ Assign responsibilities for making such changes and identify a contact person.
- ❑ Determine the calendar of implementation, taking into consideration the agency's current data collection schedule.
- ❑ Make user-friendly software changes to data entry screens that reflect the two-part question.

Coding, Reporting, Storing, Bridging

- ❑ Several coding options exist
 - ❑ Easy coding for data entry
 - ❑ keep the original individual responses using two-part question, not just the 7 categories currently required for reporting to ED
 - ❑ Different codes for storing
- ❑ Do not recycle old codes



Coding



The federal guidance does not indicate any coding schemes. States are allowed to design their own coding structure, as long as they are able to report the racial and ethnic data using the seven aggregate categories. We assign each race/ethnicity group as 'Y/N' in State reporting, we recommend do the same in their collection systems. '1/0' can also be used to assign to each category, but must be converted to 'Y/N' when data are submitted to the State.

Race and Ethnicity Category	State Guidance	Alternative
Hispanic/Latino	Y/N	1/0
American Indian/Alaska Native	Y/N	1/0
Asian	Y/N	1/0
Black or African American	Y/N	1/0
Hawaiian Native/Other Pacific Islander	Y/N	1/0
White	Y/N	1/0

Bridging Period



- Bridging period – 2009-10, transitioning from 1977 standards to 1997 standards
- Districts to keep the ‘Primary Race/Ethnicity’ until completely transitioned to ‘Comprehensive Race/Ethnicity’ data collection and reporting
- No change – a primary racial category is group that most clearly reflects the student’s recognition of his or her community or with which the student most identifies.

Online Resources



- ☐ State Implementation Guidance with letter from Commissioner :
<http://www.ride.ri.gov/RIDE/RaceAndEthnicityDataCollection.aspx>
- ☐ Answers to related policy questions is at:
<http://www.ed.gov/policy/rschstat/guid/raceethnicity/questions.html>
- ☐ A summary that allows you to access these (and other) related documents is:
<http://www.ed.gov/about/offices/list/oeped>
- ☐ You can also get to them through the following links
<http://www.ed.gov/policy/rschstat/guid/raceethnicity/index.html>
<http://www.ed.gov/policy/landing.jhtml>
<http://www.ed.gov/policy/rschstat/guid/edpicks.jhtml>
- ☐ The Forum Guide to Race/Ethnicity Data Implementation is now available online at:
<http://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=2008802>
- ☐ The Dear Colleague letter from Assistant Secretary Bill Evers is at:
<http://www.ed.gov/policy/rschstat/guid/raceethnicity/letter.html>



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